

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO. 09-206</b>
<b>v.</b>	*	<b>SECTION: "C" (1)</b>
<b>PERRY BOOTH, IV</b>	*	<b>VIOLATIONS: 18 U.S.C. § 1030(a)(2)</b>
	*	
*	*	*

**FACTUAL BASIS**

If this case were to proceed to trial, the Government would prove the guilt of the defendant beyond a reasonable doubt through the introduction of admissible evidence and the testimony of credible and competent witnesses. More specifically, the government would prove the following:

The defendant was employed as an Assistant District Attorney for Jefferson Parish when this incident occurred and was assigned to the Juvenile Division. On June 22, 2008, the defendant was driving with his wife on I-10 westbound near Gulfport, MS. He was in his personal vehicle. His wife was in the car. JM was also driving on I-10 westbound. He was returning from vacation with his family. JM and the defendant were unfamiliar with each other.

JM and the defendant had a near accident. No one was hurt and there was no damage to their cars. Both continued to their homes in Louisiana. The defendant, however, recorded the license plate number of JM 's car.

The defendant was incensed by the incident. He attempted to learn the identity of JM through the Internet. When he was unable to do so, he asked an investigator at the Jefferson Parish District Attorney's Office to run the license plate number. The investigator did so using the NCIC system and provided the defendant with the name and address of the registered owner. The investigator believed the information was requested for a legitimate law enforcement purpose.

After the defendant received the information, he wrote a threatening letter to JM, and sent it to him at his home in Metairie, Louisiana. It was received on June 29, 2008 and opened by JM's wife. In the letter the defendant made reference to the near collision and berated, insulted and threatened the victim.

In summary, all of the evidence introduced at trial would establish the elements of the offense and prove the guilt of the defendant beyond a reasonable doubt.

READ AND APPROVED:

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PROVINO MOSCA (Date)  
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MARK A. MILLER (Date)  
Chief, Organized Crime Strike Force Unit

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PERRY BOOTH, IV (Date)  
Defendant

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